

Ulteig

We listen. We solve.®

CODE OF BUSINESS ETHICS AND CONDUCT



NOVEMBER 2021

ULTEIG CODE OF BUSINESS ETHICS AND CONDUCT

Since 1944, Ulteig has built a culture with a strong sense of purpose centered on its Values. Those values - which include Client Success, Integrity, Enthusiasm, Inclusion, Agility, and Innovation - define who we are and guide our behaviors. In our business dealings and relationships, Integrity is at the core of how we show up. Ulteig's reputation for legal and ethical behavior is one of our most valuable assets. This reputation has been built upon a policy of strict compliance with the law and the conduct of business with the highest standards of ethical behavior.

This Code of Business Ethics and Conduct (the "Code") is intended to inform employees and Ulteig's Supply Chain of their legal and ethical obligations to Ulteig and its clients. Our Directors, CEO, the Ulteig Leadership Team, managers and supervisors will ensure that employees understand and comply with this Code. All Ulteig employees are required to report all violations of the Code. It is the obligation of The Ulteig Leadership Team, managers and supervisors to ensure that each employee under their direction reads and understands the Code.

No code can cover every possible business situation. If you have any doubts or concerns regarding the Code or any conduct, please review these issues with your immediate supervisor. You can also discuss any matter with our Human Resources and Legal & Risk teams. If you prefer, you can make your report anonymously by using Ulteig's confidential and anonymous Business Ethics and Conduct Hotline (833-480-0010).

Ulteig considers compliance with this Code to be vital. Ulteig's reputation for quality professional services and high standards can only be maintained through consistently honest and ethical dealings. Each of us must sustain that reputation by adhering to the principles of integrity, honesty and respect articulated in this Code. The examples provided in the "Ulteig Integrity in Action" subsections are supportive practices for illustrative purposes only, and are not an exhaustive list of expectations.

While we expect all employees to follow this Code, please note that it does not create a contract of employment, and nothing in this document is intended to alter the at-will status of your employment. Employees who violate the laws, regulations, these standards, or our policies are subject to disciplinary action, up to and including termination of employment.

For purposes of this Code, the "Supply Chain" includes any Contractor or Agent that is a third party from whom Ulteig receives services, labor, equipment, supplies, subcontracts some or all of work from a client, and so on. Every link in Ulteig's Supply Chain is required to abide by this Code. Failure to do so in any manner whatsoever is grounds for termination of any contract, business arrangement, or other dealings with Ulteig.

December 2021



**SINCE 1944,
ULTEIG HAS BUILT A CULTURE
WITH A STRONG SENSE OF PURPOSE
CENTERED ON ITS VALUES.**



3350





06	COMMITTED TO HIGH ETHICAL STANDARDS
	COMMITTED TO CLIENTS
	HEALTH, SAFETY AND ENVIRONMENT
	DRUG-FREE ENVIRONMENT
	WORKPLACE VIOLENCE
	ANTI-HARASSMENT
	ANTI-DISCRIMINATION AND EQUAL EMPLOYMENT OPPORTUNITY
	CONFIDENTIAL AND PROPRIETARY INFORMATION
11	COMMITTED TO FOLLOWING ALL APPLICABLE LAWS
	POLITICAL ACTIVITIES
	GOVERNMENT CONTRACTING AND DEALINGS
	INTERNATIONAL BUSINESS
	ANTI-BRIBERY AND BUSINESS COURTESIES
	INSIDER INFORMATION
	ANTITRUST AND COMPETITION LAWS
	ANTI-SLAVERY AND ANTI-HUMAN TRAFFICKING
	CONFLICTS OF INTEREST
18	COMPLIANCE PROCESS
	MANAGERS AND SUPERVISORS MUST
	ULTEIG EMPLOYEES AND AFFILIATED WORKFORCE MUST
	CONFIDENTIAL CONVERSATIONS
	INVESTIGATING SUSPECTED VIOLATIONS
	PROHIBITION AGAINST RETALIATION
	DISCIPLINARY ACTION
	ULTEIG BUSINESS ETHICS AND CONDUCT HOTLINE

ULTEIG IS COMMITTED TO HIGH ETHICAL STANDARDS

Beyond legal compliance, Ulteig is committed to conducting business in a fair, impartial, and ethical manner. Ulteig's Directors, Officers, Employees, Agents, and Supply Chain ("Ulteig Employees and Affiliated Workforce") will act with the highest standards of business and personal ethics in the discharge of their assigned duties and responsibilities. Unless otherwise noted, this document is applicable to all individuals listed in this paragraph.

It is the responsibility of every individual involved with Ulteig to act with uncompromising integrity and honesty in the discharge of their assigned duties and responsibilities.

Ulteig will support this Code and conduct its duties and responsibilities in a manner compatible with carrying it out and achieving its goals. Ulteig management will inform the organization about this Code, promptly investigate allegations of misconduct, take appropriate disciplinary action, and take steps to ensure retaliation is prohibited. Ulteig strictly prohibits any form of retaliation against any person who reports conduct that may violate this Code.

COMMITTED TO CLIENTS

Ulteig is committed to achieving client satisfaction through delivering high quality and innovative professional services. It is the dedication, expertise, and enthusiasm of Ulteig's Employees that drives our quality and innovation.

Each Ulteig supervisor and manager is responsible for ensuring the effectiveness of Ulteig's quality assurance program. Ulteig management will encourage Employees to consistently seek new, more innovative ways to increase quality, efficiency, and effectiveness. Each Ulteig Employee will take responsibility for the quality of the work they perform and consistently assess their own efforts against the Company's quality expectations.

Ulteig is committed to preventing quality problems and viewing existing quality problems as opportunities for improvement. Ulteig makes use of available information, such as new technology or lessons learned, from internal and external organizations to promote a culture committed to quality and excellence.

Ulteig established a performance management system to ensure that the Company's performance and quality objectives are being attained. Central to this system will be a set of performance standards that include quality of execution.

Ulteig will submit timely, accurate, honest, and complete invoices to its clients.

ULTEIG INTEGRITY IN ACTION

- Complete post-completion project reviews to identify opportunities for improvement.
- Take accountability for your errors.
- Ensure that your work hours are properly allocated to clients.
- Do your best and check your work.



HEALTH, SAFETY AND ENVIRONMENT

Ulteig is committed to providing a safe and healthy workplace throughout all its facilities, offices, and work sites and to making every effort towards eliminating or minimizing any environmentally adverse effects of its operations. Ulteig Employees and Affiliated Workforce will observe and comply with all applicable laws and regulations concerning the health and safety of their Employees and visitors in the workplace.

Ulteig strictly prohibits the possession of any licensed or unlicensed firearm or other weapon on Ulteig property.

Ulteig addresses the environmental impact of our operations by reducing waste, emissions, and discharges and by using energy efficiently. Ulteig strives to be good citizens in every community in which we operate.

ULTEIG INTEGRITY IN ACTION

- Report conditions that may threaten the health or safety of your co-workers.
- Be mindful of opportunities for recycling and proper disposal of office waste.
- Don't bring a firearm onto Ulteig's property unless authorized, in advance and in writing.
- Look for and share ideas on how to improve your work environment.
- Report any violation of this Code.

DRUG-FREE ENVIRONMENT

Ulteig is committed to providing a work environment free of illegal drugs, alcohol, and other intoxicants, including recreational marijuana as legalized in some locations. Ulteig strictly prohibits the possession, use, purchase, sale, distribution, possession, dispensation, transfer or manufacture of illegal drugs on the Company's premises or while conducting Company business and expects this policy to be adhered to by all site visitors, including clients and all Ulteig Employees and Affiliated Workforce. Ulteig also prohibits reporting to work or conducting company business under the influence of illegal drugs, alcohol, or any other intoxicant, including recreational marijuana as legalized in some locations.

As a condition of continued employment with Ulteig, Employees must abide by the terms of this policy and advise Ulteig immediately of any criminal drug conviction involving conduct occurring in the workplace or while conducting company business. Ulteig may demand that any member of the Supply Chain replace one of their employees who does not abide by this policy on the applicable Ulteig project.

ULTEIG INTEGRITY IN ACTION

- Never endanger yourself or anyone else through the use of drugs, alcohol or other intoxicants.
- Never come to work under the influence of drugs, alcohol or intoxicants.
- Notify Ulteig's Human Resources Department of any criminal conviction related to drug activity in the workplace (which includes any location where one is in the performance of duties) within five (5) days after such conviction.
- Understand and follow Ulteig's policy regarding drugs and alcohol.
- Report any violation or suspected violation of this policy that you know or have reason to believe has occurred in the workplace.

WORKPLACE VIOLENCE

Ulteig strictly prohibits violent behavior, whether committed by or against Ulteig Employees and Affiliated Workforce. Violent behavior is considered a serious act of misconduct and may subject an Employee to disciplinary action, including immediate discharge. All site visitors, including clients and all Ulteig Employees and Affiliated Workforce, are expected to adhere to this policy. Ulteig may demand that any member of the Supply Chain replace one of their employees who does not abide by this policy on the applicable Ulteig project.

As used in this Code, the term "violent behavior" includes, without limitation, making threatening remarks, causing physical injury to someone else, intentionally damaging someone else's property, or acting aggressively in a way that causes someone else to fear injury.

ULTEIG INTEGRITY IN ACTION

- Never make threats to another person.
- Never use force or intimidation to achieve a result.
- Work to de-escalate volatile situations.
- Avoid violent or potentially violent situations.
- Report all incidents of workplace violence immediately.

ANTI-HARASSMENT

Ulteig promotes a workplace that embraces the unique backgrounds and perspectives of all individuals. It is Ulteig policy that all Ulteig Employees and Affiliated Workforce, regardless of their backgrounds or perspectives, should be treated with dignity and respect. Ulteig is committed to providing a work environment that is free from harassment and inappropriate behavior.

As used in this Code, the term "harassment" includes any form of harassment based on age, race, religion, color, national origin, sex, marital or family status, sexual orientation, gender identity, genetic status, physical or mental disability, veteran status, or other status protected by law. As used in this Code, the term "inappropriate behavior" includes unprofessional, offensive, or disrespectful behavior, even if not illegal, that interferes with Ulteig's commitment to providing a professional and respectful work environment.

Inappropriate behavior is considered a serious act of misconduct and may subject a Director, Officer or Employee to disciplinary action up to and including immediate discharge. Ulteig may demand that any

member of the Supply Chain replace one of their employees who does not abide by this policy on the applicable Ulteig project. It is not considered harassment of any sort for supervisors or managers to enforce job performance and standards of conduct in a fair and consistent manner.

ULTEIG INTEGRITY IN ACTION

- Respect your fellow employees.
- Help create a peaceful and professional environment.
- Never participate in or tolerate harassment whether verbal, visual or physical.
- Never make racial or religious slurs or propagate a hostile work environment.
- Report all incidents of harassment immediately.

ANTI-DISCRIMINATION AND EQUAL EMPLOYMENT OPPORTUNITY

Ulteig strives to promote a diverse, equitable and inclusive workplace. Ulteig strictly prohibits discrimination based on age, race, religion, color, national origin, sex, marital or family status, sexual orientation, gender identity, genetic status, physical or mental disability, veteran status, or other status protected by law.

Ulteig is committed to fair, equitable and legally compliant policies and practices in all aspects of employment including, but not limited to: recruiting, hiring, work and service assignments, evaluations, promotions, compensation, benefits, transfers, discipline, and terminations.

Ulteig endeavors to create a workforce that reflects the diverse population of the communities in which it operates. Ulteig takes, and expects its Supply Chain to take, affirmative steps to promote the employment and advancement of minorities, women, persons with disabilities, and veterans. Ulteig applies every good faith effort to develop and implement a set of specific and result-oriented procedures (an “Affirmative Action Plan”) designed to increase the pool of qualified minorities, veterans, persons with disabilities and women.

Ulteig management will conduct periodic self-audits and reviews of personnel practices and actions to ensure compliance with this Code. It is not considered discrimination of any sort for supervisors or managers to enforce job performance and standards of conduct in a fair, non-discriminatory, and consistent manner.



ULTEIG INTEGRITY IN ACTION

- Create an atmosphere free of any suggestion of discrimination.
- Don't treat any employee differently because of their age, race, religion, color, national origin, sex, marital or family status, sexual orientation, gender identity, genetic status, physical or mental disability, veteran status, or any other protected status.
- Do not make or tolerate discriminatory jokes, comments or remarks.
- Promptly report any violation of this Policy, regardless of whether the offending person is an Ulteig Employee or member of the Affiliated Workforce.

CONFIDENTIAL AND PROPRIETARY INFORMATION

Ulteig respects the confidential and proprietary information of other parties. Ulteig will use only legal and ethical means to collect and employ business and market information to better understand our markets, clients, and competitors.

Ulteig's confidential and proprietary information is a valuable asset. All Ulteig Employees and Affiliated Workforce are responsible for protecting Ulteig's confidential and proprietary information from unauthorized disclosure.

Ulteig will not collect another party's confidential or proprietary information without that party's permission. As used in this Code, the terms "confidential" and "proprietary" may include administrative, sales, marketing, or technical information. Specific examples of confidential or proprietary information may include: financial data; trade secrets; sales figures; employee information; client or supplier lists; wage and salary data; capital investment plans; strategic plans; financial projections; technical reports; proprietary design methods and processes; pricing and profit data; and information about future management changes. The acquisition of such information without that party's permission, or the disclosure of confidential or proprietary information is a serious act of misconduct and may be a violation of anti-trust laws and the Antitrust and Competition Laws section of this Code.

ULTEIG INTEGRITY IN ACTION

- Preserve the confidentiality of information entrusted to you.
- When working with confidential information, communicate on a need-to-know basis.
- Be aware that confidential information exists in both paper and electronic formats.
- Never obtain a third-party's confidential information without their permission.
- Always obtain permission before disclosing Ulteig's confidential information.



ULTEIG IS COMMITTED TO FOLLOWING ALL APPLICABLE LAWS

It is the personal responsibility of each Ulteig Employee and member of the Affiliated Workforce to observe and comply with all laws, regulations, and policies applicable to their assigned duties and responsibilities and to assist Ulteig in complying with all such laws, regulations and policies applicable to it or the conduct of its business.

As a condition of employment, Ulteig expects its Employees to diligently ask questions, seek guidance, report suspected violations, express concerns regarding compliance and to adhere to this policy and its related procedures.

Ulteig's Directors, Officers and Employees will not delegate substantial authority to anyone they are aware, or through the exercise of due diligence would become aware, of having engaged in illegal activities or other conduct inconsistent with an effective compliance and ethics program.

Persons subject to disciplinary measures will include, in addition to the violator, others involved in the wrongdoing such as (i) persons who fail to use reasonable care to detect a violation, (ii) persons who if requested to divulge information withhold material information regarding a violation, (iii) supervisors who approve or condone the violations, and (iv) individuals who retaliate or attempt to retaliate against any person for reporting violations or violators.

Subject to any applicable document retention program, Ulteig will document its compliance efforts and results to evidence its commitment to comply with the standards and procedures set forth above.

POLITICAL ACTIVITIES

Ulteig is committed to complying with all campaign finance and lobbying laws or regulations wherever Ulteig does business. Additionally, Ulteig supports its Directors', Officers', and Employees' right to become involved in civic affairs and to participate in the political process so long as they abide by all applicable laws.

Ulteig recognizes and respects that all people may make political contributions with their own funds and support political parties and candidates on their own time. Ulteig's Directors, Officers, and Employees will not, in their individual political expression, including through social media channels, mention Ulteig or use any company resources that might give the appearance the individual is acting on Ulteig's behalf without the prior review and approval from the Chief Executive Officer.

Ulteig will not contribute any company funds, goods, or services, directly or indirectly, to any political party or to the campaign for or against any candidate for political office, unless so permitted by law and authorized by the Chief Executive Officer. No Ulteig Employee or member of the Affiliated Workforce will apply any pressure, direct or implied, on any other Ulteig Employee that infringes upon that individual's right to decide whether, to whom and in what amount a personal political contribution is to be made.

Ulteig prohibits political campaigning or partisan political activities of any type at any Ulteig workplace or facility. Ulteig's Directors, Officers, and Employees will not participate in partisan political activities during paid working hours. Directors, Officers, and Employees may not wear or display political campaign buttons, T-shirts, hats, or other materials bearing political messages or referring to a political candidate.

ULTEIG INTEGRITY IN ACTION

- Make clear that you are not speaking on behalf of Ulteig when expressing your personal political positions.
- Never engage in partisan political activities while you are working.
- Never pressure your co-workers to share your personal political opinions.
- Never use Ulteig's assets for the benefit of any political party or candidate.

GOVERNMENT CONTRACTING AND DEALINGS

In the course of its government dealings Ulteig Employees and Affiliated Workforce will observe and comply with all applicable national, state or provincial, and local laws or regulations. The laws and regulations related to doing business with governments are complex. It is the personal responsibility of each Ulteig Employee and member of the Affiliated Workforce to follow these laws and regulations carefully in the discharge of their assigned duties and responsibilities. Ulteig will comply with all applicable procurement regulations.

Any Ulteig Employee found to be mischarging on a government contract will be subject to disciplinary action up to, and including, termination. Employees who knowingly make false time charges, do so outside the scope of their employment, and may be guilty of a crime.

Ulteig Employees and Affiliated Workforce will, in accordance with all Government security regulations, protect classified or proprietary materials or information from unauthorized access, distribution or use. None will seek information for which they do not have proper clearance and a need to know.

Ulteig will comply with applicable state, national, and international statutes and regulations governing the employment of former military, any applicable defense department, federal, or other government employees. Ulteig supervisors and managers who are responsible for Employees, and Affiliated Workforce, who perform work on government contracts will ensure that their Employees are trained regarding the Company's policies relating to government contracting and dealings and that such training is properly documented. Ulteig Employees and Affiliated Workforce are strictly prohibited from shifting costs among government contracts or projects.

ULTEIG INTEGRITY IN ACTION

- Always document your work.
- Never make a change without following procedures.
- Perform all tests in accordance with the contract terms.
- Record your time carefully, promptly, and accurately.
- Be accurate, honest, and timely in all certifications.

INTERNATIONAL BUSINESS

Ulteig Employees and Affiliated Workforce will comply with the legal requirements of each country in which Ulteig conducts business, including import, export and tax laws, as well as with applicable United States laws.



Ulteig will not cooperate with any restrictive trade practice or boycott prohibited or penalized under United States or applicable local laws. Ulteig Employees and Affiliated Workforce will comply with applicable export control laws in those countries in which they do business. This includes trade sanctions, sales, travel to embargoed countries, transfers of technology or information to citizens or permanent residents of foreign countries.

The entertaining of government officials, or retaining any agents or consultants that may sell or assist in sales to non-United States governments or government-owned businesses, giving, offering, or authorizing directly or indirectly, anything of value (money, goods, or services) to any individual, political parties, or candidates for the purpose of obtaining favorable government action, or getting or keeping government business, are covered in the Anti-Bribery and Business Courtesies section of this Code.

ULTEIG INTEGRITY IN ACTION

- Educate yourself about the laws and customs of the countries in which you work.
- Never conduct a transaction involving an international party without reviewing the matter with Ulteig's Legal & Risk Department.
- Never engage in or support restrictive international trade practices or boycotts.
- Be aware that international transfers of equipment or technology may require prior approval, licensing, and reporting.
- Never give, offer or authorize, directly or indirectly, anything of value to anyone for the purpose of obtaining favorable governmental action.

ANTI-BRIBERY AND BUSINESS COURTESIES

Ulteig is committed to competing on the merits of our products and services. Ulteig Employees and Affiliated Workforce will not influence or attempt to influence a client's decision to purchase services from Ulteig by offering business courtesies.

Ulteig Employees and Affiliated Workforce will also not ask for or accept any business courtesy offered in a real or perceived attempt to obtain favorable treatment, motivate misconduct, or to garner undue influence from Ulteig Employees or Affiliated Workforce. This includes strict compliance with the U.S. Foreign Corrupt Practices Act, the Canadian Corruption of Foreign Public Officials Act, and all local equivalents in any jurisdiction where Ulteig conducts business.

Ulteig Employees and Affiliated Workforce who offer any Business Courtesy will ensure that:

- It is ethical and legal in all respects.
- It advances a bona fide business purpose.
- It cannot reasonably be interpreted as an attempt to gain an improper business advantage.
- That it will not reflect negatively on Ulteig's reputation.

Ulteig strictly prohibits Ulteig Employees and Affiliated Workforce from offering, giving, asking for, or taking any bribe, kickback or other similar unlawful payment from any supplier, client, public official, political party or official, candidate for public office or other individual, in any country, to secure any contract, concession or other favorable treatment for Ulteig. Any who do offer, give, ask for, or take any bribe, kickback or other similar unlawful payment will be subject to disciplinary action by the Company, and may also, under prevailing statutes, be subject to fines, imprisonment, and civil litigation. Ulteig Employees and Affiliated

Workforce will not accept any Business Courtesy offered in a real or perceived attempt to:

- Influence favorable action by Ulteig.
- Motivate the individual to do anything that is prohibited by law, regulation, or policy.
- Gain an unfair competitive advantage by influencing the individual discretionary decisions.

Ulteig will not accept any business courtesy that creates the perception of a conflict of interest, divided loyalties, or that the accepting individual or Ulteig party are subject to the undue influence of another.

Ulteig prohibits the transfer of Company funds or assets to any supplier, client, public official, political party or official, candidate for public office or other individual in the form of bribes, kickbacks, or other payoffs. Ulteig Employees and Affiliated Workforce will not offer or give a Business Courtesy to any foreign official without prior written approval of Ulteig's Legal & Risk Department.

As used in this Code, the term "Business Courtesy" means a present, gift, gratuity, hospitality, or favor given by or on behalf of Ulteig for which fair market value is not paid by the recipient. A Business Courtesy can be a tangible or intangible benefit, including, but not limited to, gifts, meals, drinks or entertainment, recreation, door prizes, honoraria, transportation, discounts, promotional items, or contributions of time, materials, facilities, or equipment. This Code does not prohibit the expenditure of nominal amounts for gifts, meals and entertainment which are an ordinary and customary business expense if they are otherwise lawful. Please verify the current statutorily permitted amount with the Legal department before offering to make such an expenditure.

As used in this Code, the terms "bribe" or "bribery" includes any offer, promise, or gift of any pecuniary or other advantage, whether directly or through intermediaries, to a public official, political party, political candidate, or party official or any other private sector employee, in order that the official or employee act or refrain from acting in relation to the performance of their duties, to obtain or retain business or other business advantage.

As used in this Code, the term "kickback" means a form of bribe in which a person entrusted by an employer or public function has some responsibility for the granting of a benefit and does so in a way that secures a return (kickback) of some of the value of the transaction or benefit for that person without the knowledge or authorization of the employer or public body to which the person is accountable.

ULTEIG INTEGRITY IN ACTION

- Always compete on the merit of your services.
- Never compromise yourself by accepting lavish or extravagant business courtesies.
- Respect and abide by the rules that govern what your clients can and cannot accept.
- Understand common practice in markets in which you conduct business.
- Never offer a business courtesy unless it is directly and substantially tied to a legitimate business purpose.

INSIDER INFORMATION

Ulteig strictly prohibits Ulteig Employees and Affiliated Workforce from trading in any company's stock or securities when, because of their employment or relationship with Ulteig, has acquired material nonpublic information about that company.

Ulteig Employees and Affiliated Workforce will not communicate material nonpublic information learned or developed through their employment or relationship with Ulteig to any person who may misuse the information and may not recommend that anyone purchase or sell any securities based on such information. As used in this Code, the term "material" means information that a reasonable investor would very likely consider important in deciding to purchase or sell a security and that could affect the price of the security. Both positive and negative information can be material. If it is unclear if the information is material, Ulteig Employees and Affiliated Workforce must assume that it is. Material nonpublic information must not be disclosed to anyone other than persons within Ulteig whose positions require them to know the information until it has been publicly released by the subject company.

As used in this Code, the term "nonpublic" means information that is not available to the public. As used in this Code the term "trading" means the purchase or sale of stocks, bonds, debentures, options, or other marketable securities. It includes trading in the securities of other firms, particularly those that are current or prospective clients or suppliers of Ulteig and those with which Ulteig may currently be negotiating.

Ulteig Employees and Affiliated Workforce will not place a purchase or sale order or recommend that another person place a purchase or sale order, in the securities of another company (or related derivative securities, such as put or call options) if the individual learns during their position or employment confidential information about the other company that is likely to affect the value of those securities.



Under federal securities laws, insider trading and tipping can result in substantial civil and criminal penalties, including fines of up to three times the profit gained, or loss avoided, as well as imprisonment. Ulteig, as the Employer, could also be liable for fines of \$1 million or more because of an individual's insider trading or tipping.

ULTEIG INTEGRITY IN ACTION

- Never buy or sell securities of any company based on confidential information that has not been released to the public.
- Never disclose inside information obtained in the course of your employment.
- Never trade if you are in doubt as to whether the information has been released to the public.
- Notify Ulteig's Legal & Risk Department if you know or suspect that others are trading in securities based on inside information.
- Be aware that personal securities transactions include those of your spouse, minor or dependent children, and other members of your household, as well as of accounts over which you or your family members exercise discretion or control.

ANTITRUST AND COMPETITION LAWS

Ulteig is committed to competing fairly and complying with all applicable antitrust and competition laws. Ulteig Employees and Affiliated Workforce will not enter into any understanding, agreement, plan, or scheme, express or implied, formal or informal, with any competitor regarding prices, terms or conditions of sale or service, production, distribution, territories, or clients that violates applicable antitrust or competition laws.

Ulteig will not exchange or discuss with a competitor prices, terms or conditions of sale or service, or any other competitive information; nor engage in any other conduct which violates applicable antitrust or competition laws. Ulteig will refer any matter having possible antitrust or competition implications to the Ulteig Legal & Risk Department prior to taking any action with respect to such matters.

ULTEIG INTEGRITY IN ACTION

- Never make false or malicious statements about our competitors.
- Never discuss pricing strategy with competitors.
- Never divide clients or territories with a competitor.
- Don't use one product to coerce a client into buying another product.
- Don't agree to boycott supplies or competitors.



ANTI-SLAVERY AND ANTI-HUMAN TRAFFICKING

Modern slavery and human trafficking are illegal, immoral, and a violation of fundamental human rights. Ulteig has a zero-tolerance approach to modern slavery and human trafficking regardless of the form it takes, whether it be exploiting individuals in any manner for personal or commercial gain or any manner of the deprivation of individuals of their personal freedom. Ulteig Employees and Affiliated Workforce will abide by such laws, and not enter into any contract or business arrangement that includes exploitation or deprivation of freedom.

ULTEIG INTEGRITY IN ACTION

- Know our clients. Know our Supply Chain.
- Be on the lookout for signs of duress or exploitation of vulnerable people, especially in temporary labor.
- Report all suspected instances of slavery or human trafficking to Ulteig's Legal & Risk Department.

CONFLICTS OF INTEREST

Ulteig Employees and Affiliated Workforce must be free from conflicts of interest that could adversely influence their judgment, objectivity, or loyalty in conducting business activities and assignments.

Ulteig recognizes that Directors, Officers and Employees may take part in legitimate financial, business, and other activities outside their jobs, but any potential conflict of interest raised by those activities must be disclosed promptly. Ulteig's Directors, Officers and Employees will avoid activities that create the appearance of a conflict of interest to ensure that Ulteig's reputation is not harmed. Conflicts of interest or potential conflicts of interest may sometimes be resolved or avoided when disclosed in a timely and proper manner.

Although it is impossible to define all circumstances that may create a conflict of interest, Ulteig believes that a conflict of interest does arise when a Director, Officer or Employee, or any other person having a close personal relationship with the Director, Officer or Employee:

- Obtains a significant financial or other beneficial interest in one of Ulteig's suppliers, clients, or competitors without first notifying Ulteig and obtaining written approval from the Chief Executive Officer or designee.
- Engages in a significant personal business transaction involving Ulteig for profit or gain, unless such transaction has first been approved in writing by the Chief Executive Officer or designee.
- Accepts money, gifts of other than nominal value, excessive hospitality, loans, guarantees of obligations or other special treatment from any supplier, client, or competitor of Ulteig.
- Participates in any sale, loan, or gift of Ulteig property without obtaining written approval from the Chief Executive Officer or designee; learns of a business opportunity through association with Ulteig and discloses it to a third party or invests in or takes the opportunity personally without first offering it to Ulteig.
- Uses Ulteig property, information, or position for personal gain; or competes with Ulteig.

As used in this Code, the phrase "person having a close personal relationship with the Director, Officer or Employee" refers, without limitation, to the individual's spouse, parents, children, siblings, mothers and fathers-in-law, sons and daughters-in-law, brothers and sisters-in-law, any person living in the same residence with the individual, or any business associate of the individual.

ULTEIG INTEGRITY IN ACTION

- Disclose activities or interests that may represent an unresolved conflict of interest.
- Abstain from decisions that involve an employee who is also a family member.
- Get approval before accepting a role with an outside business or non-profit concern.
- Never use Ulteig assets or information for your personal gain or advantage.
- Avoid taking personal discounts or other benefits from suppliers, service providers or clients that are not available to all Ulteig employees.

COMPLIANCE PROCESS

We are all responsible for acting ethically. It is a duty we all share, and we must fulfill this duty to each other. Managers and supervisors are expected to provide timely guidance to employees on ethics and compliance concerns. Ulteig supervisors or managers who fail to report conduct of which they are aware and which may violate this Policy will be subject to disciplinary action, up to and including suspension and termination of employment.

The more we talk openly about business conduct and ethics, the clearer we will be about what is expected.

MANAGERS AND SUPERVISORS MUST:

- Lead by example.
- Affirm the need to follow the laws, regulations, and policies that control our business.
- Encourage Employees to ask questions and get advice before they act.
- Consult with Ulteig's Human Resources or Legal & Risk departments and report all violations of this Code to them.
- Implement and cooperate with measures to detect risks.
- Take prompt action to correct problems.

All conversations, calls, and reports made in good faith will be taken seriously. Ulteig will investigate all reported concerns—promptly and in confidence—and resolve those concerns appropriately. If we find that our policies have been violated, we will take action, including imposing disciplinary action, implementing system-wide changes, or notifying the right governmental agency. Not only will we deal with a specific situation, but we will also make changes so that similar problems do not recur.

ULTEIG EMPLOYEES AND AFFILIATED WORKFORCE MUST:

- Read, understand, and use the Code.
- Learn the details of the policies that specifically impact your work.
- Use the resources available to you for guidance and assistance.
- Take the training required to do your job.
- Cooperate with any internal investigations about a reported ethics or compliance matter.
- Talk to your supervisor, Ulteig's Human Resources or Legal & Risk departments and report all violations of this Code to them.

When you are uncertain about the right course of conduct, ask questions and get answers before you act.

CONFIDENTIAL CONVERSATIONS

Conversations regarding compliance or ethical issues are treated confidentially. You will be told if your identity is needed to address your question or concern satisfactorily. Calls to our Business Ethics and Conduct Hotline are confidential and will not be traced. You may remain anonymous when you call. We will attempt to protect the identity of anyone who makes a good faith report or inquiry consistent with our legal obligations. Be advised that anonymous communications sometimes make it very difficult to report back to you and may limit the thoroughness of our investigation.

INVESTIGATING SUSPECTED VIOLATIONS

If you believe that someone associated with Ulteig has violated our policies, you are expected to bring the matter in good faith to the attention of a member of the Ulteig Leadership Team, your manager, Ulteig's Legal & Risk or Human Resources Department so that we can conduct a prompt and thorough investigation. You can make reports by telephone or other form of virtual meeting, through e-mail, by making an appointment, or by contacting Ulteig's confidential and anonymous Business Ethics and Conduct Hotline (833- 480-0010 or lighthouse-services.com/ulteig). You have a personal responsibility to report activity that appears to violate laws, regulations, policies, or this Code.

PROHIBITION AGAINST RETALIATION

Ulteig will not retaliate against any person who brings to our attention, in good faith, an ethics, compliance, discrimination or harassment issue. Individuals who raise concerns or who help us resolve reported matters (including those participating in an investigation) are protected against retaliation.

Anyone who uses the ethics and compliance program to spread falsehoods, threaten others, or damage another person's reputation will be subject to disciplinary action. Discouraging Ulteig Employees and Affiliated Workforce from making a report or getting the help they need is prohibited and could result in disciplinary action.

DISCIPLINARY ACTION

Violations of laws, regulations, principles, this Code, or our policies can have severe consequences. Some violations may be criminal in nature and punishable by fine or imprisonment. Ulteig Employees and Affiliated Workforce who violate the laws, regulations, this Code, or our policies are subject to Ulteig action and might also be breaking a law that could expose themselves to substantial criminal fines, prison terms and civil damages. Employees may face disciplinary measures which include, but are not limited to, counseling, verbal or written reprimands, warnings, probation or suspension without pay, demotions, reductions in salary, termination of employment and restitution.

ULTEIG BUSINESS ETHICS AND CONDUCT HOTLINE

Anyone, including anyone not employed by Ulteig, may call Ulteig's Business Ethics and Conduct Hotline (833-480-0010) 24 hours a day, 7 days a week or access their site at www.lighthouse-services.com/ulteig to express a concern or report a possible violation of a law, regulation, or policy. Calls to Ulteig's Business Ethics and Conduct Hotline are handled promptly, discreetly and professionally. Ulteig will investigate reports of illegal or unethical conduct received through the Business Ethics and Conduct Hotline and take appropriate action to resolve each reported matter.

When reporting a concern, you may be asked to provide the time, location, names of the people involved, and other details so that we can investigate your concerns. Every call to the Business Ethics and Conduct Hotline is handled promptly, discreetly, and professionally. We will investigate reports of illegal or unethical conduct received through the Business Ethics and Conduct Hotline and take appropriate action to resolve each reported matter.

Please remember that this Code is not a contract for or of employment, and nothing in this Code alters at-will employment status.

You can also access this Code on Ulteig's UConnect intranet site.